



# EAST CAMBRIDGESHIRE DISTRICT COUNCIL

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My Ref:

Your ref

Date: 16 March 2018

Inspector Louise Nurser BA(Hons) Dip UP MRTPI

Sent by email, via the Programme Officer

Dear Inspector Nurser

## **RE: East Cambridgeshire Local Plan – inspector Initial Questions**

Thank you for your letter of 14 March 2018 (reference ED002), setting out some initial questions and observations.

In essence, you sought clarification as to whether the Council intended to carry out additional work, as a result of representations received. You gave examples, and I respond specifically to those.

In respect of the Environment Agency (EA) representations, we have commenced engagement with the EA in respect of determining more precisely what its concerns are, and what may need addressing. We were a little surprised by the EA's representations, because (contrary to their representations) engagement did continue during 2017 with the organisation, beyond February 2017. A number of staff changes / availability at EA has perhaps confused matters.

Nevertheless, we have also engaged with our consultants, in order to determine how best to address the concerns of the EA. That said, it should be noted that the method of the Water Cycle Study (WCS) was agreed with EA, and it is a method used successfully elsewhere.

Overall, our preliminary view is that some additional work will likely be needed in respect of the WCS (particular in relation to clarifying the situation in Littleport and Burwell), but this will not be so extensive or fundamental as to delay matters or require significant suggested amendments to the Local Plan as submitted. Our initial view is that it is more a matter of clarifying the WCS, perhaps via an 'addendum' to the WCS.

More widely, EA made detailed comments on a variety of policies. Our initial view is that, as appropriate and if necessary, relatively straightforward suggested modifications could be agreed between the EA and the Council, potentially via a statement of common ground, and such suggested modifications will then be put to you in due course.

In respect of Wildlife Trust / Natural England (NE) representations, in relation to the HRA, the Council's preliminary view is not that the HRA / Local Plan is fundamentally unsound, but that, in particular, further mitigation measures need to be acknowledged (in the HRA) and required (in the Local Plan). We are

carefully considering this request, alongside wider comments made by each organisation. It is likely a slightly updated HRA will be necessary (which appears to be a relatively straightforward task) and likely a limited number of modifications might need suggesting in due course. We are reassured by NE comment that its outstanding issues 'we believe ... can be easily addressed' (see representation PS652), though the Council has to be mindful that NE's request for all development to make a financial contribution to implementing green infrastructure may be unlawful, under the present CIL Regulations, so an alternative solution may need to be found.

Overall, our preliminary view is that some limited additional work will likely be needed in respect of the HRA, and potentially some limited complimentary suggested modifications, but this will not be so fundamental as to delay matters or require significant or substantial amendments to the Local Plan as submitted.

In respect of Historic England (HE), the vast majority of its representations are site specific, and, where concern is expressed, are often along the lines of the need for extra wording to make reference to a nearby heritage asset. On the whole, the Council does not see the need for such additional wording, as the Local Plan as a whole needs to be read by a decision maker, and such matters are appropriately addressed via the heritage policy (LP27). However, for a small number of sites and other matters raised by HE, it may be appropriate for suggested modifications to be agreed, and we have commenced preliminary discussion with HE in that respect.

In respect of Cambridgeshire County Council (CCC) comments on the transport evidence base, we were a little surprised by such comments, as CCC does not appear to have considered, in particular, the evidence report as published (PE28) covering the matters which they express concern on. The Council considers the evidence as published (PE28 and other material) is appropriate and proportionate, and that further strengthening of the evidence base is not required. Nevertheless, we will engage with CCC with the aim of clarifying its position.

In terms of timing, I envisage all of the matters raised above should be addressed, and updated evidence, position statements, statements of common ground and/or suggested modifications available, by around the end of April or early May. Some will likely be sooner, and if you would prefer any to be prioritised sooner, then please advise accordingly.

More generally, aside from the organisations listed above, I can confirm that the Council is not presently intending to prepare any additional evidence material, though it continues to thoroughly review all representations to determine whether any suggested modifications and/or statements of common ground would be appropriate, to aid a smooth running of the examination.

I trust this letter helps clarify matters, but I would be happy to provide further clarification as appropriate.

Yours sincerely

Richard Kay  
Strategic Planning Manager